

ALEX G. TSE (CABN 152348)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 17-00583 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	RESETTING CHANGE OF PLEA
v.)	
)	
DANIEL SHIREY,)	
)	
Defendant.)	
)	

STIPULATION

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The parties appeared before the Court on March 27, 2018 at 2:30 p.m. for a status conference. Defendant Daniel Shirey, represented by Kenneth Wine, was present and in custody. Assistant United States Attorney Karen Kreuzkamp appeared for the Government. The parties asked the Court to set the case for a change of plea on April 17, 2018 at 2:30 p.m.

2. The parties have been and continue to work towards resolution, but do not believe they will be in a position to move forward with a change of plea on April 17. The parties respectfully request that the Court allow the parties one more week to resolve the case and ask that the Court vacate the April 17, 2018 hearing and reset the matter for a change of plea on April 24, 2018 at 2:30 p.m.

1 IT IS SO STIPULATED.

2 DATED: April 12, 2018

ALEX G. TSE
Acting United States Attorney

3
4 /s/
KAREN KREUZKAMP
5 Assistant United States Attorney

6 DATED: April 12, 2018

7
8 /s/
KENNETH WINE
9 Counsel for Defendant
Daniel Shirey

10
11
12
13 **~~PROPOSED~~ ORDER**

14 Based upon the representation of counsel, the Court vacates the April 17, 2018 change of plea
15 hearing and resets the hearing for April 24, 2018 at 2:30 p.m.

16 IT IS SO ORDERED.

17
18
19 DATED: 4/12/18

20 
HON. RICHARD SEEBORG
United States District Judge